

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI**

MELVIN LAMPTON JR.,)	
)	
Plaintiff,)	
)	
v.)	No. 4:22-cv-398-GAF
)	
SAINT GOBAIN ABRASIVES, INC.,)	
)	
Defendant.)	

**PLAINTIFF’S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
PROPOSED CLASS ACTION SETTLEMENT**

Plaintiff Melvin Lampton, Jr., by and through undersigned counsel, hereby moves this Court pursuant to Fed. R. Civ. P. 23 to (1) grant preliminary approval of the proposed class action settlement; (2) appoint the named Plaintiff as class representative and Plaintiff’s attorney as Settlement Class Counsel; (3) approve the parties’ proposed forms and methods of giving Settlement Class members notice of the proposed settlement; (4) direct that notice be given to Settlement Class members in the proposed forms and manners; (5) set deadlines and procedures for people who fall within the Settlement Class definition to exclude themselves and for Settlement Class members to object to the proposed settlement; and (6) schedule a Final Approval Hearing to determine whether the settlement should be granted final approval and whether Settlement Class Counsel should be awarded attorney’s fees and expenses and the Plaintiff a requested service award.

Plaintiff has conferred with Defendant, and Defendant is unopposed to the relief requested herein.

Plaintiff's Suggestions in Support of this Motion is being filed contemporaneously herewith for the Court's review and consideration.

Dated: January 31, 2024

Respectfully submitted,

HUMPHREY, FARRINGTON & McCLAIN, P.C.

/s/ Paul D. Anderson

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of January, 2024, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which sent notification to all counsel of record.

/s/ Paul D. Anderson

ATTORNEY FOR PLAINTIFF